

**THE ROSEN LAW FIRM, P.A.**

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Class counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

VINH NGUYEN, INDIVIDUALLY  
AND ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiff,

v.

RADIANT PHARMACEUTICALS  
CORPORATION AND DOUGLAS C.  
MACLELLAN,

Defendants.

CASE No.: CV-11-0406-DOC  
(MLGx)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF  
MOTION AND MOTION IN  
SUPPORT OF FINAL APPROVAL  
OF CLASS ACTION  
SETTLEMENT AND PLAN OF  
ALLOCATION**

Judge: Hon. David O. Carter  
Courtroom: 9D  
Hearing Date: April 22, 2014  
Hearing Time: 8:30 a.m.

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that, pursuant to Court's Preliminary Approval and  
 3 Notice Order of January 31, 2014, on April 22, 2014 at 8:30 a.m., or as soon  
 4 thereafter as counsel may be heard, at the Ronald Reagan Federal Building and  
 5 U.S. Courthouse, 411 West Fourth Street, Santa Anna, CA 92701, before the  
 6 Honorable David O. Carter, United States District Judge, Lead Plaintiffs,  
 7 through their Counsel, will move for final approval of the class action Settlement  
 8 and the Plan of Allocation of settlement proceeds. Lead Plaintiffs' motion is  
 9 based on the Memorandum of Law in Support; the Declaration of Laurence M.  
 10 Rosen in Support of Lead Plaintiffs' Motion for Final Approval of Class Action  
 11 Settlement and Plan of Allocation, and Award of Attorneys' Fees and  
 12 Reimbursement of Expenses; the Stipulation and Agreement of Settlement dated  
 13 December 16, 2013; and all other pleadings and matters of record and such  
 14 additional evidence or argument as may be presented at the hearing. An  
 15 additional copy of the parties' [Proposed] Final Judgment and Order of  
 16 Dismissal is filed herewith.

17 DATED: March 24, 2014

Respectfully submitted,

**THE ROSEN LAW FIRM P.A.**

20 /s/ Laurence M. Rosen

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Lead Counsel for Lead Plaintiffs and the  
 Class

**CERTIFICATE OF SERVICE**

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A. I am over the age of eighteen.

On March 24, 2014, I electronically filed the attached **LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on March 24, 2014

/s/ Laurence Rosen  
Laurence M. Rosen